

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:) Case No.: 21-42564
)
VARNELL WOODS)
REGINA WOODS,)
) Chapter 13
)
Debtors.)

**DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS
FOR FAILURE TO MAKE PLAN PAYMENTS**

COMES NOW Debtors, by and through counsel, Adams Law Group, and in Response to Trustee's Motion to Dismiss for Failure to Make Payments, state to the Court as follows:

1. Debtors admit the allegations in paragraph 1 of the motion.
2. Debtors admit the allegations in paragraph 2 of the motion.
3. Debtors admits the allegations in paragraph 3 of the motion.
4. Debtors admit the allegations in paragraph 4 of the motion.
5. Debtors admit the allegations in paragraph 5 of the motion.
6. Further answering, Debtors intend to become current in plan payments by hearing.

WHEREFORE, for good cause shown, Debtors pray the Trustee's Motion be denied and for further orders of relief as the Court deems appropriate under the circumstances.

Respectfully submitted,

ADAMS LAW GROUP

/s/ Jack J. Adams

JACK J. ADAMS #37791MO #37791

Attorney for Debtor

22 Richmond Center Ct.

St. Peters, Missouri 63376

Ph. (636) 397-4744 Fax (636) 397-3978

contact@thinkadamslaw.com

CERTIFICATE OF SERVICE

I. I certify that a true and correct copy of the foregoing document was filed electronically on May 24, 2024, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

II. I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, address to those parties listed on the Court's Manual Notice List and listed below on May 24, 2024:

VARNELL WOODS
REGINA WOODS
2226 BAY TREE DR
SAINT PETERS, MO 63376

/s/ Susan W Shannon

Susan W Shannon, BK Paralegal